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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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THOMAS H. COLE
CLERK, U.S. DISTRICT COURT
W.D. OF TN, MEMPHIS

ASHER WILLIE A. REESE

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

SEARS Holdings
2800 N. Germantown Pkwy
Memphis, TN 38133
(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, ASHER WILLIE A. REESE
(name of plaintiff)

is a citizen of the United States and resides at 9375 CLUB WALK CT
(street address)

LAKELAND shelby TN
(city) (country) (state)

38002 (901) 383-6868
(zip code) (telephone number)

3. Defendant SEARS

(defendant's name)

lives at, or its business is located at 2800 N. GERMANTOWN PKWY
(street address)
Memphis, TN
38133

4. Plaintiff sought employment from the defendant or was employed by the defendant at

SAME AS ABOVE
(street address)

(city)

(country)

(state)

(zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 6 JAN 2011 + FREEDOM
(day) (month) (year)6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 13 JAN 2011
(day) (month) (year)7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 13 JAN 2011 Attachment 1
(day) (month) (year)8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 27 Sept 2011 Attachment 2
(day) (month) (year)
this complaint.)9. Because of plaintiff's (1) ☒ race, (2) ___ color, (3) ___ sex, (4) ☒ religion,
(5) ___ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ___ failed to promote plaintiff.

(d) Retaliation for the acquired accommodationThat the new manager didn't want.

10. The circumstances under which defendant discriminated against plaintiff were as follows:

See Attachment 3

Note: After a HEARING concerning unemployment benefits, judge ruled in favor of Plaintiff. This overruled Defendant's main position regarding reason for termination. See Attachment 5

11. The acts set forth in paragraph 9 of this complaint

- (a) ☒ are still being committed by defendant.
- (b) ☐ are no longer being committed by defendant.
- (c) ☐ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

Attachment 4

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or
- (b) ☐ Defendant be directed to re-employ plaintiff, or
- (c) ☐ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to See Attachment 6

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (X) No ()

Asher Miles R. Reese
SIGNATURE OF PLAINTIFF